

Chief Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

TRINIDAD QUIJADA VALENZUELA,
Defendant.

CASE NO. MJ20-788

COMPLAINT for VIOLATION

21 U.S.C. §§ 841(a)(1), (b)(1)(C) -
Possession of Fentanyl with Intent to
Distribute

BEFORE, the Honorable Brian A. Tsuchida, Chief United States Magistrate
Judge, U.S. Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Possession of Fentanyl with Intent to Distribute)

On or about December 10, 2020, in King County, within the Western District of
Washington, and elsewhere, TRINIDAD QUIJADA VALENZUELA knowingly and
intentionally possessed, with the intent to distribute, fentanyl (N-phenyl-N-[1-(2-
phenylethyl)-4-piperidinyl] propanamide), a substance controlled under Title 21, United
States Code, Section 812, Schedule II.

1 All in violation of Title 21, United States Code, Section 841(b)(1)(C).

2 And the complainant states that this Complaint is based on the following
3 information:

4 I, Michelle Hardin-Pineda, being first duly sworn on oath, depose and say:

5 **I. INTRODUCTION**

6 1. I am a Special Agent with Immigration and Customs Enforcement ("ICE"),
7 Homeland Security Investigations ("HSI"), and have been so employed since February
8 2006. I am currently assigned to the HSI Field Office in Seattle, Washington. In my
9 current capacity, I investigate federal criminal violations that include drug offenses in
10 violation of Title 21, United States Code, Section 841.

11 2. I am a graduate of the Federal Law Enforcement Training Center
12 ("FLETC") in Glynco, Georgia. While at FLETC, I completed the Criminal Investigators
13 Training Program and Immigration and Customs Enforcement Special Agent Training. I
14 have received training and gained experience in the manner and operations of drug
15 trafficking organizations, methods of importation and exportation, distribution, and
16 smuggling of controlled substances, and sources and methods of financial and money
17 laundering investigations. I have investigated drug trafficking organizations distributing
18 controlled substances, including marijuana, heroin, methamphetamine, and cocaine. As a
19 Special Agent, I have participated in the execution of search warrants for narcotics
20 violations. As a result of this training and experience, I am familiar with narcotics
21 trafficking, and I am particularly familiar with the narcotics traffickers who live and
22 operate in the Seattle area.

23 **II. PURPOSE OF THE AFFIDAVIT**

24 3. The facts set forth in this Complaint are based on the following: my
25 personal and direct participation in the investigation, my training and experience, my
26 conversations with witnesses and other law enforcement personnel participating in this
27 and related investigations, and my review of relevant documents and reports.
28

1 4. This complaint is submitted to establish probable cause for the arrest of
2 TRINIDAD QUIJADA VALENZUELA for possession of a controlled substance
3 (fentanyl) with intent to distribute in violation of Title 21 of the United States Code,
4 Section § 841(a)(1). Given that limited purpose, this complaint does not contain all of
5 the facts known to me regarding this investigation. This affidavit is intended to show
6 merely that there is a sufficient factual basis for a fair determination of probable cause to
7 support the complaint. All times listed herein are approximate.

8 **III. SUMMARY OF INVESTIGATION**

9 5. In November 2020, Confidential Source 1 (CS-1) advised HSI that he/she
10 had been in phone contact with an unknown drug trafficker in Mexico (Mexico Contact).
11 According to CS-1, this drug trafficker said he could introduce him/her to another drug
12 trafficker in Arizona, who could provide large quantities of fentanyl pills. The Mexico
13 Contact gave CS-1 a phone number for this Arizona drug trafficker, and that phone
14 number was later identified as belonging to TRINIDAD QUIJADA VALENZUELA.

15 6. On or about December 4, 2020, CS-1 told HSI agents that he/she had
16 arranged for delivery 15,000-20,000 fentanyl pills to Washington State. CS-1 said the
17 plan was for the pills to be transported to Washington State the following week. On or
18 about December 5, 2020, the Mexico Contact told CS-1 that the 20,000 fentanyl pills
19 were scheduled to arrive in Phoenix, Arizona, on Monday (December 7) and would leave
20 the next day for Washington State. On or about December 8, 2020, the Mexico Contact
21 gave CS-1 a phone number, 520-869-9934, as the contact number for the person who
22 would be transporting the pills from Arizona to Washington.

23 7. On December 9, 2020, CS-1 told HSI that the previous evening, the Mexico
24 Contact told him/her that the pills would be leaving in the morning and would arrive in
25 Washington around noon the following day. Later that day, CS-1 told HSI agents he/she
26 received confirmation that the fentanyl pills had left Phoenix, Arizona, at noon on
27 December 9, 2020, and were headed to Washington State. On December 10, 2020, HSI
28

1 agents received information from CS-1 that the load was expected to arrive at 5:00 pm
2 that evening. CS-1, at the direction of HSI agents, arranged to meet and conduct the buy
3 at a Home Depot in Federal Way, Washington.

4 8. At approximately 4:35 p.m. on December 10, CS-1 received a call from
5 telephone number 520-869-9934 to alert him that the person transporting the pills was at
6 the Home Depot. Agents meet with CS-1 and another Confidential Source (CS-2), who
7 was going to be the person conducting the controlled buy. Agents searched CS-2 and
8 CS-2's car before CS-2 drove to the Home Depot, and no contraband was found. Agents
9 established surveillance in the parking lot at Home Depot, and then CS-2 drove into the
10 area.

11 9. At approximately 5:25 p.m., CS-2 contacted the person at telephone
12 number 520-869-9934 and directed him to his/her location in the parking lot. Agents
13 watched a red Mini Cooper bearing California license plate 8LSU803 drive to CS-2's
14 location and park next to CS-2's car. Agents then watched as TRINIDAD QUIJADA
15 VALENZUELA got out of the Mini Cooper and meet with CS-2.

16 10. The meeting was audio recorded but conducted in Spanish. However, CS-2
17 reported the following during a debrief. CS-2 advised when the Mini Cooper (with a
18 driver and two passengers) pulled up, VALENZUELA, who was the passenger in the
19 backseat, got out and they talked outside. CS-2 explained to VALENZUELA that he/she
20 was there to check the product (or something to that effect). CS-2 said that
21 VALENZUELA then pulled a box of Tide detergent out of a suitcase in the trunk of the
22 car and they both got into the backseat. VALENZUELA opened the box and pulled out a
23 package. After removing the plastic, he revealed a Ziploc-type sandwich bag that
24 contained several thousand pills. The pills were blue with M 30 stamped on them. CS-2
25 then got out of the vehicle to make the call to CS-1 to confirm he/she had seen the pills.
26 Agents searched CS-2 and CS-2's car following the controlled buy and again confirmed
27 there were no controlled substances present.
28

1 11. Once CS-2 called CS-1 to confirm the presence of the fentanyl pills, agents
2 moved in and detained all three occupants of the Mini Cooper, including
3 VALENZUELA. In the back seat, agents saw a box that appeared to be Tide laundry
4 detergent. After obtaining consent to search the car, agents removed the box of purported
5 detergent and found two packages of suspected fentanyl pills. They also found the
6 sandwich bag of fentanyl pills seen by CS-2 in the floorboard. As noted, the pills were
7 blue and stamped M 30, which I know from my training and experience to be consistent
8 with fentanyl pills. A narcotics detection dog was applied to the box of Tide while it was
9 still in the car, and the dog alerted to the odor of controlled substances. They were not
10 field tested due to safety concerns.

11 12. Each of the people in the Mini Cooper was advised of their *Miranda* rights
12 (in Spanish), and all three acknowledged they understood their rights and would speak
13 with law enforcement. All three stated they understood their rights and wished to speak
14 with agents without an attorney present.

15 13. The driver told agents he was just the driver of the car and knew nothing
16 about the sale of controlled substances. The front seat passenger told agents he saw
17 VALENZUELA put a box inside the car in Phoenix, Arizona, and that he knew
18 VALENZUELA intended to sell the box to CS-2. He denied knowledge of any
19 controlled substances.

20 14. VALENZUELA said that he received a call from someone in Mexico
21 telling him to do this. He said he was here from Phoenix, Arizona, to sell a box of soap.
22 VALENZUELA had three cellphones on him that he acknowledged were he personal
23 phones. Agents dialed the number that CS-1 and CS-2 had been in contact with leading
24 up to the controlled buy, 520-869-9934, and one of the phones seized from
25 VALENZUELA began to ring.
26
27
28

CI RELIABILITY

15. CS-1 is cooperating with HSI in exchange for monetary compensation and immigration benefits and has been arrested for grand theft, fictitious checks, carrying a concealed weapon, providing false ID to law enforcement, forgery and driving without a license. CS-1 has been convicted of forgery (2010) and grand theft (2012). As a result of CS-1's cooperation over the last few years, HSI agents have obtained and executed search warrants, made arrest, seized drug proceeds and controlled substances. During the course of the CS-1's cooperation with HSI agents, he/she has been determined by those agents to be reliable and to provide trustworthy and timely information.

16. CS-2 is cooperating with HSI in exchange for monetary compensation and immigration benefits. CS-2 has no criminal history. CS-2 has provided information and/or participated in multiple meetings and operations that resulted in the acquisition of controlled substances and/or drug proceeds. During the course of CS-2's cooperation with HSI agents, he/she has been determined by those agents to be reliable and to provide trustworthy and timely information.

IV. CONCLUSION

17. Based on the above facts, I respectfully submit that there is probable cause to believe that TRINIDAD QUIJADA VALENZUELA knowingly and intentionally possessed fentanyl with the intent to distribute in violation of Title 21 of the United States Code § 841(a)(1), (b)(1)(C).


MICHELLE HARDIN-PINEDA
SPECIAL AGENT, HSI,

Based on the above-named Complainant having provided a sworn statement attesting to the truth of the foregoing Affidavit this 11th day of December, 2020, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this 11th day of December, 2020.


BRIAN A. TSUCHIDA
CHIEF United States Magistrate Judge